

December 31, 2024

VIA ECF

The Honorable Arun Subramanian
United States District Judge
United States District Court, Southern District of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007

Re: *United States et al. v. Live Nation Entertainment, Inc. et al.*; 1:24-cv-03973-AS-SLC

Dear Judge Subramanian:

Plaintiff the United States of America and the Plaintiff States (collectively, “Plaintiffs”), and Defendants Live Nation Entertainment, Inc. and Ticketmaster L.L.C. (collectively, “Defendants”), submit this joint letter and the Parties’ Expert Stipulation and Proposed Order Regarding Expert Discovery (attached as **Exhibit A**) pursuant to Fed. R. Civ. P. 29. After meeting and conferring over several weeks, the parties have reached agreement on issues relating to the scope of expert discovery and testimony in this action, and the Proposed Order Regarding Expert Discovery reflects that agreement and is consistent with orders in similar cases.

[signatures on following page]

LATHAM & WATKINS LLP¹

/s/ Alfred C. Pfeiffer

Alfred C. Pfeiffer (admitted *pro hac vice*)
Co-Lead Trial Counsel
Timothy L. O'Mara (admitted *pro hac vice*)
Jennifer L. Giordano
Andrew M. Gass (admitted *pro hac vice*)
Kelly S. Fayne (admitted *pro hac vice*)
Lindsey S. Champlin (admitted *pro hac vice*)
Robin L. Gushman (admitted *pro hac vice*)

505 Montgomery Street, Suite 2000
San Francisco, CA 94111
(415) 391-0600

555 11th Street, NW, Suite 1000
Washington, D.C. 20004
(202) 637-2200

Al.Pfeiffer@lw.com
Tim.O'Mara@lw.com
Jennifer.Giordano@lw.com
Andrew.Gass@lw.com
Kelly.Fayne@lw.com
Lindsey.Champlin@lw.com
Robin.Gushman@lw.com

*Attorneys for Defendants Live Nation
Entertainment, Inc. and Ticketmaster L.L.C.*

CRAVATH, SWAINE & MOORE LLP

/s/ David R. Marriott

David R. Marriott
Co-Lead Trial Counsel
Lauren A. Moskowitz
Jesse M. Weiss
Nicole M. Peles

Two Manhattan West
375 Ninth Avenue
New York, NY 10001
(212) 474-1000

dmarriott@cravath.com
lmoskowitz@cravath.com
jweiss@cravath.com
npeles@cravath.com

*Attorneys for Defendants Live Nation
Entertainment, Inc. and Ticketmaster L.L.C.*

¹ Defendants use electronic signatures with consent in accordance with Rule 8.5(b) of the Court's ECF Rules and Instructions.

UNITED STATES DEP'T OF JUSTICE
ANTITRUST DIVISION

/s/ Bonny Sweeney

Bonny Sweeney

Seana Buzbee

John Thornton

Brian A. White

450 5th St. NW, Suite 4000

Washington, DC 20530

Bonny.Sweeney@usdoj.gov

Seana.Buzbee@usdoj.gov

John.Thornburg@usdoj.gov

Brian.White6@usdoj.gov

Los Angeles, CA 90013
Telephone: (213) 269-6040
Email: paula.gibson@doj.ca.gov

Attorney for Plaintiff State of California

/s/ Conor J. May

Conor J. May (admitted *pro hac vice*)

Assistant Attorney General

Antitrust Unit

Colorado Department of Law

1300 Broadway, 7th Floor

Denver, CO 80203

Telephone: (720) 508-6000

Email: Conor.May@coag.gov

Attorney for Plaintiff State of Colorado

/s/ Robert A. Bernheim

Robert A. Bernheim (admitted *pro hac vice*)

Office of the Arizona Attorney General

Consumer Protection & Advocacy Section

2005 N. Central Avenue

Phoenix, AZ 85004

Telephone: (602) 542-3725

Fax: (602) 542-4377

Email: Robert.Bernheim@azag.gov

Attorney for Plaintiff State of Arizona

/s/ Kim Carlson McGee

Kim Carlson McGee (admitted *pro hac vice*)

Assistant Attorney General

Office of the Attorney General of

Connecticut

165 Capitol Avenue

Hartford, CT 06106

Telephone: 860-808-5030

Email: kim.mcgee@ct.gov

Attorney for Plaintiff State of Connecticut

/s/ Elizabeth G. Arthur

Elizabeth G. Arthur (admitted *pro hac vice*)

Senior Assistant Attorney General

Office of the Attorney General for the

District of Columbia

400 6th Street NW, 10th Floor

Washington, DC 20001

Email: Elizabeth.arthur@dc.gov

Attorney for Plaintiff District of Columbia

/s/ Elizabeth A. Brady

Lizabeth A. Brady

Director, Antitrust Division

Florida Office of the Attorney General

PL-01 The Capitol

Tallahassee, FL 32399-1050

Telephone: 850-414-3300

Email: Liz.Brady@myfloridalegal.com

Attorney for Plaintiff State of Florida

/s/ Richard S. Schultz

Richard S. Schultz (Admitted *pro hac vice*)
Assistant Attorney General
Office of the Illinois Attorney General
Antitrust Bureau
115 S. LaSalle Street, Floor 23
Chicago, Illinois 60603
Telephone: (872) 272-0996
Email: Richard.Schultz@ilag.gov
Attorney for Plaintiff State of Illinois

/s/ Jesse Moore

Jesse Moore (admitted *pro hac vice*)
Deputy Attorney General
Office of the Indiana Attorney General
302 W. Washington St., Fifth Floor
Indianapolis, IN 46204
Telephone: 317-232-4956
Email: Jesse.Moore@atg.in.gov
Attorney for Plaintiff State of Indiana

/s/ Noah Goerlitz

Noah Goerlitz (admitted *pro hac vice*)
Assistant Attorney General
Office of the Iowa Attorney General
1305 E. Walnut St.
Des Moines, IA 50319
Telephone: (515) 281-5164
Email: noah.goerlitz@ag.iowa.gov
Attorney for Plaintiff State of Iowa

/s/ Lynette R. Bakker

Lynette R. Bakker (admitted *pro hac vice*)
First Assistant Attorney General
Public Protection Division
Kansas Office of Attorney General
120 S.W. 10th Avenue, 2nd Floor
Topeka, KS 66612-1597
Telephone: (785) 296-3751
Email: lynette.bakker@ag.ks.gov
Attorney for Plaintiff State of Kansas

/s/ Mario Guadamud

Mario Guadamud (admitted *pro hac vice*)
Louisiana Office of Attorney General
1885 North Third Street

Baton Rouge, LA 70802
Telephone: (225) 326-6400
Fax: (225) 326-6498
Email: GuadamudM@ag.louisiana.gov
Attorney for Plaintiff State of Louisiana

/s/ Schonette J. Walker

Schonette J. Walker (Admitted *pro hac vice*)
Assistant Attorney General
Chief, Antitrust Division
200 St. Paul Place, 19th floor
Baltimore, Maryland 21202
Telephone: (410) 576-6470
Email: swalker@oag.state.md.us
Attorney for Plaintiff State of Maryland

/s/ Katherine W. Krems

Katherine W. Krems (admitted *pro hac vice*)
Assistant Attorney General, Antitrust
Division
Office of the Massachusetts Attorney
General
One Ashburton Place, 18th Floor
Boston, MA 02108
Telephone: (617) 963-2189
Email: Katherine.Krems@mass.gov
*Attorney for Plaintiff Commonwealth of
Massachusetts*

/s/ LeAnn D. Scott

LeAnn D. Scott (admitted *pro hac vice*)
Assistant Attorney General
Corporate Oversight Division
Michigan Department of Attorney General
P.O. Box 30736
Lansing, MI 48909
Telephone: (517) 335-7632
Email: ScottL21@michigan.gov
Attorney for Plaintiff State of Michigan

/s/ Zach Biesanz

Zach Biesanz
Senior Enforcement Counsel
Antitrust Division
Office of the Minnesota Attorney General
445 Minnesota Street, Suite 1400
Saint Paul, MN 55101
Telephone: (651) 757-1257
Email: zach.biesanz@ag.state.mn.us
Attorney for Plaintiff State of Minnesota

/s/ Gerald L. Kucia

Gerald L. Kucia (admitted *pro hac vice*)
Special Assistant Attorney General
Mississippi Office of Attorney General
Post Office Box 220
Jackson, Mississippi 39205
Telephone: (601) 359-4223
Email: Gerald.Kucia@ago.ms.gov.
Attorney for Plaintiff State of Mississippi

/s/ Justin C. McCully

Justin C. McCully (Admitted *pro hac vice*)
Assistant Attorney General
Consumer Protection Bureau
Office of the Nebraska Attorney General
2115 State Capitol
Lincoln, NE 68509
Telephone: (402) 471-9305
Email: justin.mccully@nebraska.gov
Attorney for Plaintiff State of Nebraska

/s/ Lucas J. Tucker

Lucas J. Tucker (admitted *pro hac vice*)
Senior Deputy Attorney General
Office of the Nevada Attorney General
Bureau of Consumer Protection
100 N. Carson St.
Carson City, NV 89701
Email: ltucker@ag.nv.gov
Attorney for Plaintiff State of Nevada

/s/ Zachary Frish

Zachary A. Frish (admitted *pro hac vice*)
Assistant Attorney General
Consumer Protection & Antitrust Bureau
New Hampshire Attorney General's Office

Department of Justice
1 Granite Place South
Concord, NH 03301
Telephone: (603) 271-2150
Email: zachary.a.frish@doj.nh.gov
Attorney for Plaintiff State of New Hampshire

/s/ Yale A. Leber

Yale A. Leber (admitted *pro hac vice*)
Deputy Attorney General
Division of Law
Antitrust Litigation and Competition
Enforcement
124 Halsey Street, 5th Floor
Newark, NJ 07101
Telephone: (973) 648-3070
Email: Yale.Leber@law.njoag.gov
Attorney for Plaintiff State of New Jersey

/s/ Jeremy R. Kasha

Jeremy R. Kasha
Assistant Attorney General
New York State Office of the Attorney
General
28 Liberty Street
New York, NY 10005
Telephone: (212) 416-8262
Email: Jeremy.Kasha@ag.ny.gov
Attorney for Plaintiff State of New York

/s/ Jeff Dan Herrera

Jeff Dan Herrera (*pro hac vice* pending)
Assistant Attorney General
Consumer Protection Division
New Mexico Department of Justice
408 Galisteo St.
Santa Fe, NM 87501
Telephone: (505) 490-4878
Email: JHerrera@nmdoj.gov
Attorney for Plaintiff State of New Mexico

/s/ Jessica V. Sutton

Jessica V. Sutton (admitted *pro hac vice*)
Special Deputy Attorney General
North Carolina Department of Justice
Post Office Box 629
Raleigh, North Carolina 27602
Telephone: (919) 716-6000
Facsimile: (919) 716-6050
Email: jsutton2@ncdoj.gov
Attorney for Plaintiff State of North Carolina

/s/ Sarah Mader

Sarah Mader (admitted *pro hac vice*)
Assistant Attorney General
Antitrust Section
Office of the Ohio Attorney General
30 E. Broad St., 26th Floor
Columbus, OH 43215
Telephone: (614) 466-4328
Email: Sarah.Mader@OhioAGO.gov
Attorney for Plaintiff State of Ohio

/s/ Robert J. Carlson

Robert J. Carlson (admitted *pro hac vice*)
Senior Assistant Attorney General
Consumer Protection Unit
Office of the Oklahoma Attorney General
15 West 6th Street
Suite 1000
Tulsa, OK 74119
Telephone: 918-581-2230
Email: robert.carlson@oag.ok.gov
Attorney for Plaintiff State of Oklahoma

/s/ Gina Ko

Gina Ko (admitted *pro hac vice*)
Assistant Attorney General
Antitrust, False Claims, and Privacy
Section
Oregon Department of Justice
100 SW Market St.,
Portland, Oregon 97201
Telephone: (971) 673-1880
Fax: (503) 378-5017
Email: Gina.Ko@doj.oregon.gov

Attorney for Plaintiff State of Oregon

/s/ Joseph S. Betsko

Joseph S. Betsko (admitted *pro hac vice*)
Assistant Chief Deputy Attorney General
Antitrust Section
Pennsylvania Office of Attorney General
Strawberry Square, 14th Floor
Harrisburg, PA 17120
Telephone: (717) 787-4530
Email: jbetsko@attorneygeneral.gov
Attorney for Plaintiff Commonwealth of Pennsylvania

/s/ Paul T.J. Meosky

Paul T.J. Meosky (admitted *pro hac vice*)
Special Assistant Attorney General
150 South Main Street
Providence, RI 02903
Telephone: (401) 274-4400, ext. 2064
Fax: (401) 222-2995
Email: pmeosky@riag.ri.gov
Attorney for Plaintiff State of Rhode Island

/s/ Danielle A. Robertson

Danielle A. Robertson (admitted *pro hac vice*)
Assistant Attorney General
Office of the Attorney General of South Carolina
P.O. Box 11549
Columbia, South Carolina 29211
Telephone: (803) 734-0274
Email: DaniRobertson@scag.gov
Attorney for Plaintiff State of South Carolina

/s/ Aaron Salberg

Aaron Salberg (admitted *pro hac vice*)
Assistant Attorney General
1302 E. Hwy 14, Suite 1
Pierre SD 57501
Email: aaron.salberg@state.sd.us
Attorney for Plaintiff State of South Dakota

/s/ Hamilton Millwee

Hamilton Millwee (admitted *pro hac vice*)
 Assistant Attorney General
 Office of the Attorney General and
 Reporter
 P.O. Box 20207
 Nashville, TN 38202
 Telephone: (615) 291-5922
 Email: Hamilton.Millwee@ag.tn.gov
Attorney for Plaintiff State of Tennessee

/s/ Diamante Smith

Diamante Smith (admitted *pro hac vice*)
 Assistant Attorney General, Antitrust
 Division
 Office of the Attorney General of Texas
 P.O. Box 12548
 Austin, TX 78711-2548
 Telephone: (512) 936-1674
Attorney for Plaintiff State of Texas

/s/ Marie W.L. Martin

Marie W.L. Martin (admitted *pro hac vice*)
 Deputy Division Director,
 Antitrust & Data Privacy Division
 Utah Office of Attorney General
 160 East 300 South, 5th Floor
 P.O. Box 140830
 Salt Lake City, UT 84114-0830
 Telephone: 801-366-0375
 Email: mwmartin@ag.utah.gov
Attorney for Plaintiff State of Utah

/s/ Sarah L. J. Aceves

Sarah L. J. Aceves (*pro hac vice*
 forthcoming)
 Assistant Attorney General
 Consumer Protection and Antitrust Unit
 Vermont Attorney General's Office
 109 State Street
 Montpelier, VT 05609
 Telephone: (802) 828-3170
 Email: sarah.aceves@vermont.gov
Attorney for Plaintiff State of Vermont

/s/ David C. Smith

David C. Smith (admitted *pro hac vice*)
 Assistant Attorney General
 Office of the Attorney General of Virginia
 202 North 9th Street
 Richmond, Virginia 23219
 Telephone: (804) 692-0588
 Facsimile: (804) 786-0122
 Email: dsmith@oag.state.va.us
Attorney for Plaintiff Commonwealth of Virginia

/s/ Rachel A. Lumen

Rachel A. Lumen (admitted *pro hac vice*)
 Assistant Attorney General
 Travis Kennedy (admitted *pro hac vice*)
 Managing Assistant Attorney General
 Antitrust Division
 Washington Office of the Attorney General
 800 Fifth Avenue, Suite 2000
 Seattle, WA 98104-3188
 Telephone: (206) 464-5343
 Email: Rachel.Lumen@atg.wa.gov
Attorneys for Plaintiff State of Washington

/s/ Douglas L. Davis

Douglas L. Davis (admitted *pro hac vice*)
 Senior Assistant Attorney General
 Consumer Protection and Antitrust Section
 West Virginia Office of Attorney General
 P.O. Box 1789
 Charleston, WV 25326
 Telephone: (304) 558-8986
 Fax: (304) 558-0184
 Email: douglas.l.davis@wvago.gov
Attorney for Plaintiff State of West Virginia

/s/ Laura E. McFarlane

Laura E. McFarlane (admitted *pro hac vice*)
 Assistant Attorney General
 Wisconsin Department of Justice
 Post Office Box 7857
 Madison, WI 53707-7857
 Telephone: (608) 266-8911
 Email: mcfarlanele@doj.state.wi.us
Attorney for Plaintiff State of Wisconsin

/s/ William T. Young

William T. Young
Assistant Attorney General
Wyoming Attorney General's Office
109 State Capitol
Cheyenne, WY 82002
Telephone: (307) 777-7841
Email: william.young@wyo.gov
Attorney for the Plaintiff State of Wyoming